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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

DEC 28 1992

In the Matter of

Administration of the
North American Numbering Plan

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) CC Docket No. 92-237
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

COMMENTS OF BELL ATLANTIC

I. Administration of the NANP

Bell Atlantic does not oppose an orderly transfer of the responsibilities of the North American Numbering Plan Administrator ("NANPA") to an entity not affiliated with Bellcore. Although Bellcore has performed the NANPA function with impartiality and skill, its decisions increasingly are met with unjustified claims of bias.¹ The threat of such charges is a needless distraction from the NANPA's complex work, and an administrator without ties to any user of numbering resources might be a less attractive target for such accusations.²

However, Bellcore should continue to administer the numbering plan until the implementation of interchangeable NPAs in

¹ E.g., Comments of Telocator in FCC Docket DA-91-1307, In the Matter of Administration of the North American Numbering Plan at 1-2 (Dec. 20, 1991); Reply Comments of McCaw Cellular Communications, Inc. at 3-8; Reply Comments of Metropolitan Fiber Systems, Inc. at 3-4.

² Regardless of who administers the NANP, the Commission should not require use of the mediation and arbitration techniques mentioned in the Notice (NOI ¶ 31). Such a requirement would have the effect of causing more litigation rather than encouraging the members of the industry to work cooperatively to resolve issues.

1995. Some of the most difficult numbering decisions will involve management of the scarce resources available before NPA expansion is accomplished, and the present NANPA organization is familiar with those issues and should be permitted to deal with them without disruption.³

The present NANPA, as the Notice of Inquiry points out, is financed entirely by Bellcore's owners and their customers. The activities of the NANPA -- whatever entity is performing them -- should be funded by all entities that benefit from NANP administration.

II. Feature Group D Carrier Identification Codes

Bell Atlantic welcomes the Commission's interest in the costs and benefits of conversion to a four-digit format for Feature Group D Carrier Identification Codes ("CICs").

As the NOI points out, the conversion to four digits imposes significant costs. It requires subscribers to learn and use more cumbersome access codes, and it requires both exchange and interexchange carriers, as well as other users of telecommunications equipment, to invest significant sums to accommodate the new format.⁴

³ If the Commission decides that the administration function should be transferred from Bellcore, it should not establish an interim advisory or oversight body. NOI ¶ 32. By the time such a body was formed and became functional, the need for it would already have passed.

⁴ In addition, developments in communications technology, such as Advanced Intelligent Network capabilities, may offer alternatives to assignment of CICs for some applications.

The industry has considered several intermediate steps, short of full CIC expansion, and, for various reasons, rejected them. Of primary concern to the industry was the need to comply with the Commission's historic policy favoring expansion, rather than rationing, of the resources needed for network access.⁵ There are only two practical methods for ensuring that there are codes available for new users.

First, the Commission could determine that the existing supply of 1000 three-digit CICs is enough to support a fully competitive marketplace and that the cost of expansion outweighs the public benefits. This conclusion would require the Commission to endorse rationing of the resource and adopt rules governing the allocation, reclamation and transfer of CICs. If this approach is adopted, the NANPA should be directed to limit the number of codes any entity can be assigned from the NANP inventory and to reclaim unused codes and codes that entities acquire (e.g., through mergers and acquisitions) in excess of the permitted number. Existing code holders should be allowed to sell their CICs to new entrants, subject to pricing guidelines approved by the FCC that are designed to prevent entities that have obtained codes free of charge from enjoying a windfall.

The second alternative would be for the Commission to require the industry to implement the expanded Feature Group D CIC format. In doing so, the Commission should allow the exchange

⁵ See Memorandum Opinion and Order, In the Matter of Petition of First Data Resources, Inc. Regarding the Availability of Feature Group B Access to End Users, released May 28, 1986.

carriers an appropriate degree of flexibility. The Commission should allow exchange carriers to determine and publish time schedules for four-digit Feature Group D expansion (a process similar to the procedures followed for equal access). If the needs of individual access purchasers differ from the published schedule, the customer and the provider can work together so that the needs of both are met.

Any decision to change existing plans must be made quickly, or not at all. Substantial investment in four-digit CIC switch software already has been made, and additional sums will be committed and spent in the next two years if the Commission does not act.

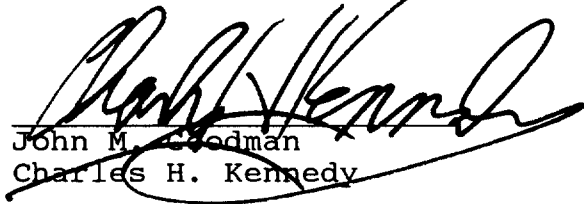
If the Commission wants to let the conversion to four-digit CICs continue, it should expressly find that the public interest requires expansion of the resource. Consistent with that decision, it should also find that all costs incurred by price cap carriers to implement four-digit CICs are eligible for exogenous cost treatment.

III. PCS Numbering

The Commission should announce a policy in favor of eventual number portability for PCS services. The same database technology that permits calls to reach a PCS customer wherever he or she is located will also make it possible to assign the PCS customer a number that can follow the customer if he or she changes PCS service providers.

Initially, until standards are developed and technology is widely deployed, PCS services are likely to be offered through numbers specific to particular service providers. While this approach might be necessary in the interim, it should not harden into permanency. Before the industry proceeds any further with the deployment of the services, the Commission should make it clear that carrier-specific numbering will be replaced with portable numbers as soon as technically feasible.⁶

Respectfully submitted,



John M. Goodman
Charles H. Kennedy

Attorneys for Bell Atlantic

1710 H Street, N.W.
Washington, D.C. 20006
(202) 392-1497

James R. Young
Of Counsel

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⁶ The NOI also asks for comments on the cost and technical feasibility of local number portability. NOI at ¶ 41. Unlike PCS, which is a new service and based upon database technology that lends itself to portable numbers, conventional landline telephone service is based on an older technology and will be far costlier, and technically more difficult, to convert to number portability. The full scope of those costs and difficulties cannot be determined now.